

# **EXHIBIT “A”**

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Horan's concerns with regard to Mr. Russin's ongoing conduct. Incredibly, *within two days following the Court's comments and instructions*, Mr. Russin continued to conduct himself in the same reprehensible manner. For example, on September 3, 2022, Mr. Russin published a podcast titled *How to Be a Closer, Fuel for the Fire, and False Gospel Preachers*. At that time, Mr. Russin made a variety of statements (presumably related to closing sales) in a brash, appalling, and aggressive manner to include the following:

- *I've always been a closer. I'm not tooting my own horn. It's just a fact ... It doesn't matter what it is ... closing in business and in life are the same. Everything in life is closing ... **If you're a man ... you got to close a woman.***
- *Closing is such an essential skill in life... **You can't be a dog, especially as a man and not know how to close.***
- *At the end of the day, whoever it is, a woman, bank teller, loan officer, girl across from you at the bar... the first thing they are buying is you ... People are animals.*
- *I got a guy that works at one of my organizations ... **This guy can smell when women are ovulating.***
- ***I can tell you right now, there's no human being on this planet that can take me out of the game** ... when they see you go through massive amounts of adversity and still come out on top, they want to drag you right down into the pit ... they have such low self-worth that they can't stand to see people win ... **They don't have the balls** to go out and win ... You gotta grab and pull him back down ... **in this bucket of misery and shit with us.***
- ***So when someone else becomes so focused on you that they want to take you out of the game** and you just keep going out and working and winning... like our recruiting company just had its biggest week ever ... we built a million dollar a year business within 6 months.*
- *Keep denting me, go ahead... bounce me around, beat me up .... I love it. **I have a sick relationship with pain. It makes me so much better...** Thank you haters! Haters make me greater!*
- *But you don't want to hyper fixate on that ... **Then you start feeding your dark side too much... That's when you want to lash out. That's when you do something that you shouldn't do.***
- *You can't jeopardize the rest of your life over a hater... **You go to jail for felonious assault.***
- ***I'm not strong enough. I'm not good enough. We are all inherently wicked.***
- *It's not that I'm not good enough. **I'm not good all.***
- *I've struggled with this a lot in the past couple of months... I feel worse now than I ever have in my life ... **I am more convicted and disgusted with myself now than I have ever been in my entire existence on this planet.***
- *The process of sanctification ... it never ends ... **Because when you remove the big sins, you just become aware of the medium ones... Like ... I'm not having sex with a bunch of people or doing drugs ... or cheating on my wife** ... Then you become violently aware of the small things ... You should feel worse than you ever have in your life ... you should be remorseful.*
- *Please donate. Please help us.*

Similarly, on the same day (September 3, 2022), Mr. Russin posted a photograph of himself with the caption **"War Ready"** on social media. Of course, these statements are no different than Mr. Russin's other public statements such as **"Money Grubbing Whores"** (referencing women who claim sexual assault

and sexual harassment), *“I do everything fast, even cummies”*, or *“Vax this Dick”* but they are even more shocking and remarkable given the timing, i.e. days following Judge Horan’s clear and direct reprimand of said conduct.

There are multiple witnesses who will testify that these types of comments are, and continue to be, typical for Mr. Russin in the AIL office and at other AIL work settings for years, including the past 6 months. The witnesses will testify that Mr. Russin’s recent comments are often followed by even more brash statements such as *“What are you going to do about it, fire me?”* As you may know, Mr. Russin has voluntarily published the same statements over the past six (6) months in other capacities.

These are merely the “highlights” of Mr. Russin’s most recent brash and appalling conduct. As you know from Plaintiff’s Amended Complaint, there are droves of similar vulgar, misogynistic, aggressive, and violent comments and conduct on behalf of Mr. Russin in his capacity as an agent of AIL and Arias Agencies over the years. Although Mr. Russin’s conduct is perhaps the most vile and egregious that I am aware of, make no mistake... there are just as many examples of other male agents’ depraved conduct that will be evidence of the toxic and hostile work environment which Defendants have subjected Plaintiff to over the past 3.5 years. Of course, the extensive list of witnesses (including Mr. Russin’s wife, Geneva Russin), documents, texts, photographs, videos, and other evidence will be shared over the course of discovery near term.

As you may know, AIL acknowledged Mr. Russin’s appalling conduct by allegedly attempting to terminate his contract on or about February 2022. AIL’s counsel referred to the alleged termination as a “remedial measure” resulting from AIL’s investigation of Plaintiff’s claims of sexual harassment. Yet, unbelievably, Mr. Russin continues to work on behalf of AIL through present. Mr. Russin performs professional services on behalf of AIL, receives income from AIL, works out of the same AIL office<sup>1</sup>, manages and attends AIL meetings, and continues to manage the same team of AIL agents as he did prior to his alleged termination. Typically, I would assume that you are already aware of these facts. Given your recent inquiries about Mr. Russin’s conduct<sup>2</sup>, however, I wanted to be sure to clarify any such confusion with all defense counsel. Defendants’ ongoing inability to provide Plaintiff with a safe working environment was clearly reflected by Judge Horan’s concerned comments about the *“escalating”* nature of Defendants’ exposure.

Whether Defendants refer to Mr. Russin as a “consultant”, “contractor”, or otherwise, it is of no matter since he continues to function as an agent on behalf of the Defendants, and in a leadership role at that ... just as he did during his daily drug and alcohol abuse, just as he did during countless episodes of sexual harassment, just as he did during his felonious criminal charges and convictions, and just as he did during an involuntary commitment to a mental health facility. All of which occurred publicly while Mr. Russin was hired, employed, retained, and celebrated as a high-ranking leader by Simon Arias and AIL.

Based on Plaintiff’s employment experience alone, Defendants’ inability to provide a safe work environment was not a mere oversight, but rather a choice. Perhaps the most blatant example is that nothing has actually changed since AIL admitted to Mr. Russin sexually harassing Plaintiff and then

<sup>1</sup> AIL and/or Arias Agencies’ Portland, Maine office.

<sup>2</sup> Contrary to your representations, this there is a significant amount of evidence to support Plaintiff’s claims that Mr. Russin’s private conduct is just as vile and offensive as his public “persona”.

misrepresenting Mr. Russin's termination as a "remedial measure". Similarly, Plaintiff's complaints of sexual harassment and insurance fraud were concealed by Defendants for at least four months after being reported to Simon Arias. And, for an additional five months, Globe Life and AIL continued to recognize Mr. Russin and Mr. Arias with "leadership" awards and generous incomes ... all the while Plaintiff was traumatized and completely unable to work. What is more, Globe Life and the Defendants never even bothered to interview Plaintiff in connection with the alleged investigation of her documented reports of insurance fraud. What is more, that doesn't even address the experiences of numerous other witnesses who will testify to eerily similar experiences while working for the Defendants.

## II.



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Age Group	Percentage
18-24	100%
25-34	100%
35-44	100%
45-54	100%
55+	100%

\_\_\_\_\_s \_\_\_\_\_s fee \_\_\_\_\_s \_\_\_\_\_s

[illegible]

[REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]

/s/ Amy N. Williamson

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# EXHIBIT "B"



Amy Williamson <awilliamson@awilliamsonlaw.com>

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## Mr. Russins ongoing conduct and exposure

3 messages

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**Amy Williamson** <awilliamson@awilliamsonlaw.com>  
To: Benjamin Webb <bwebb@cozzalaw.com>

Thu, Dec 22, 2022 at 11:06 PM

Hi Ben,

As you know, ever since my client filed suit, Mr. Russin continues to publish threats and use intimidation tactics against her. I have cited to some of them in court pleadings. In response, Judge Horan admonished Mr. Russin and you directly, warning you that he is creating exponential exposure for himself as a result. In fact, she stated that this civil case would be the least of his concerns if he continues his "brash" and "appalling" conduct. What is more, Judge Horan has only seen a small fraction of your client's conduct. Yet, Mr. Russin remains as brash and appalling as ever.

Yesterday, you asked me for an extension of time to produce Mr. Russins discovery responses to include responses to RFPD, interrogatories and RFA. Appreciating the potential volume of information and documents, I agreed to an extension with a new deadline of tomorrow, 12/23.

Ironically enough, tonight Mr. Russin posted the attached photo and message on his instagram page. You will see that he states that his cigar is for a "dear old friend... getting a big batch of presents tomorrow."

I am sure you will continue to take the position that these posts are not about my client but rather another "dear friend" or some other nonsense. When you take a step back and take a look at the timing of all of these posts in conjunction with the developments in the litigation and my clients claims, I feel confident that any juror (let alone Judge Horan) will see right through those defenses.

I will be meeting with my client over the holidays to discuss next steps but out of respect for you, I wanted to give you a heads up that your client's appalling conduct is creating ongoing exposure for him on many levels.

Thanks,  
Amy

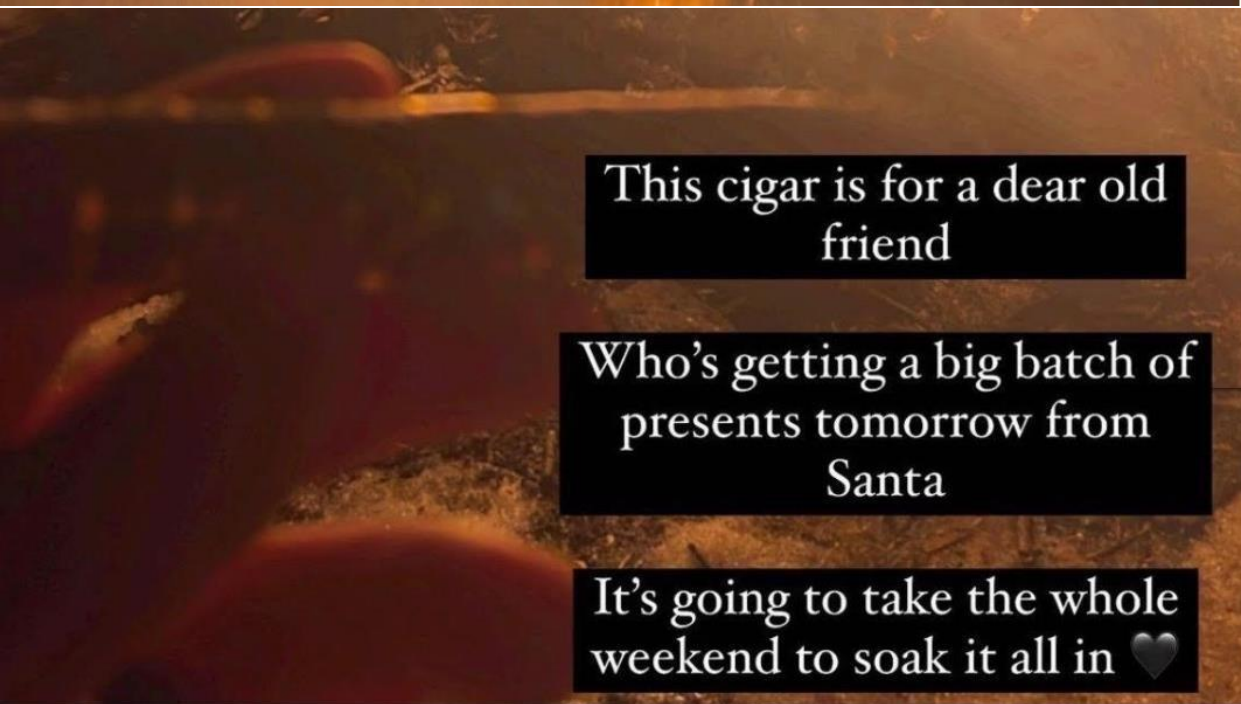
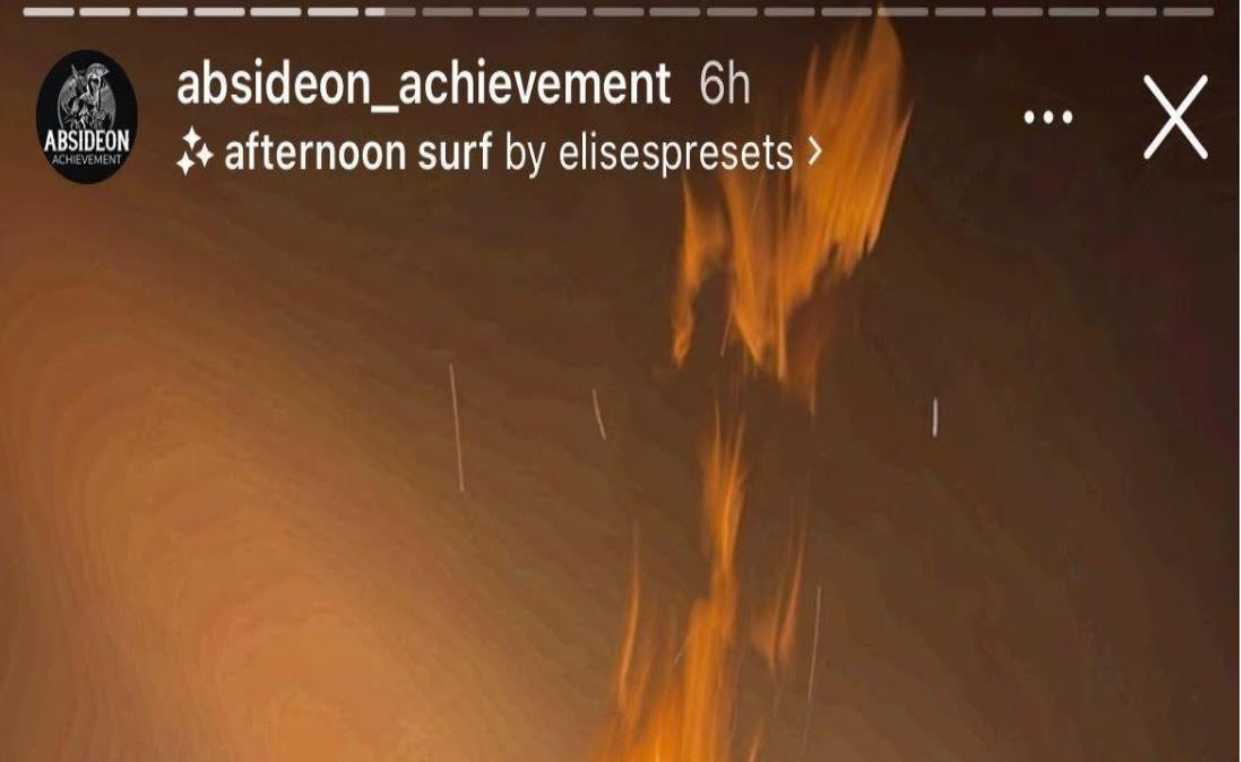


10:42 🌙



absideon\_achievement 6h

💎💎 afternoon surf by elisespresets >



This cigar is for a dear old friend

Who's getting a big batch of presents tomorrow from Santa

It's going to take the whole weekend to soak it all in ❤️

# **EXHIBIT “C”**



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# Transcript of Reneé Margaret Zinsky

**Date:** January 13, 2023

**Case:** Zinsky -v- Russin, et al.

**Planet Depos**

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**Fax:** 888-503-3767

**Email:** [transcripts@planetdepos.com](mailto:transcripts@planetdepos.com)

**www.planetdepos.com**

Transcript of René Margaret Zinsky  
January 13, 2023

1 (1 to 4)

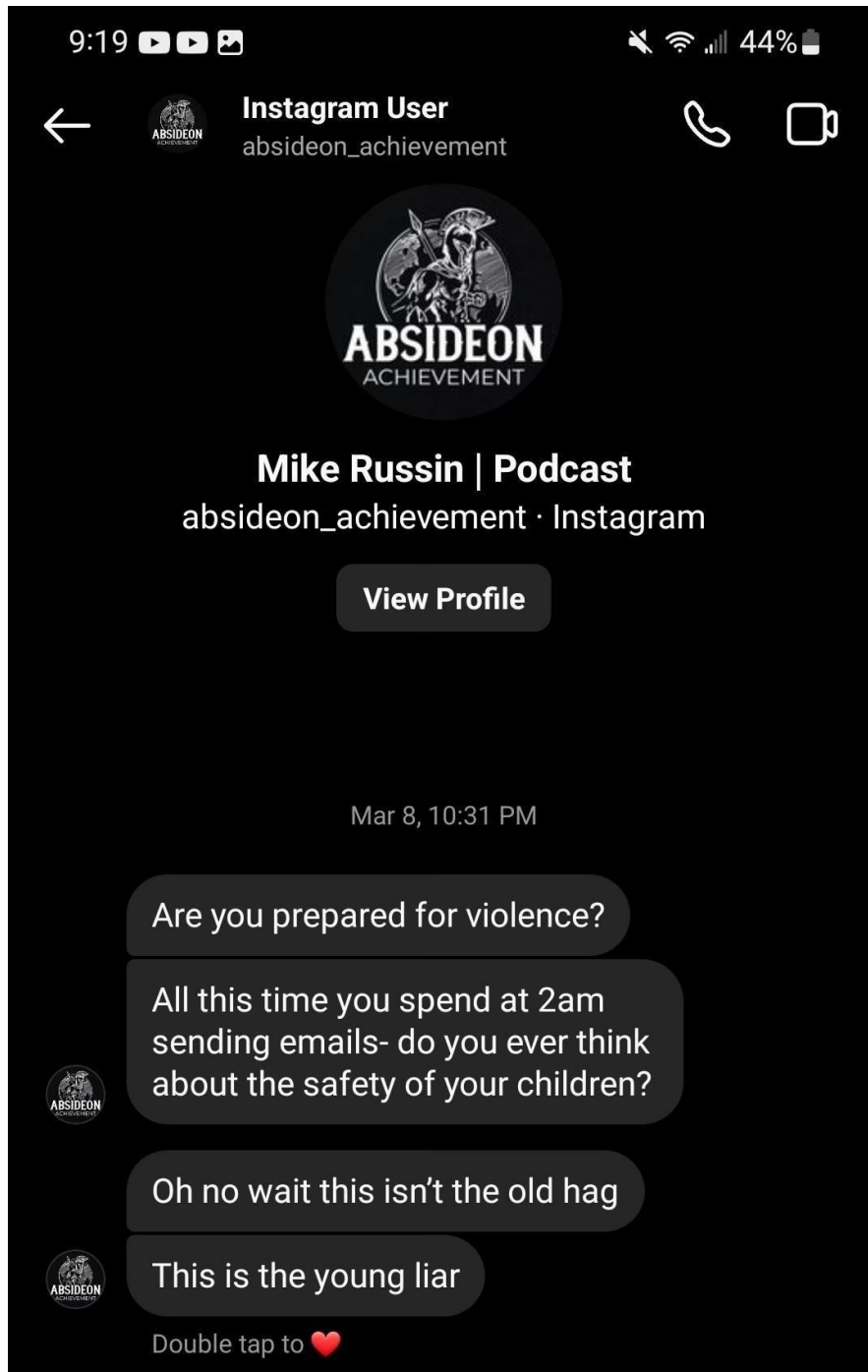
1	3
1 IN THE UNITED STATES DISTRICT COURT	1 A P P E A R A N C E S
2 FOR THE WESTERN DISTRICT OF PENNSYLVANIA	2 ON BEHALF OF THE PLAINTIFF:
3 - - - - -x	3 AMY N. WILLIAMSON, ESQUIRE
4 RENEE ZINSKY, :	4 WILLIAMSON LAW LLC
5 Plaintiff, :	5 Law and Finance Building
6 v. : Civil Action No.	6 429 Fourth Avenue, Suite 300
7 MICHAEL RUSSIN, RUSSIN : 2:22-cv-547	7 Pittsburgh, Pennsylvania 15219
8 FINANCIAL, RUSSIN GROUP, :	8 (412)932-2744
9 SIMON ARIAS, III, ARIAS :	9
10 AGENCIES, S.A. ARIAS :	10 ON BEHALF OF THE DEFENDANTS:
11 HOLDINGS, LLC, AMERICAN :	11 BENJAMIN D. WEBB, ESQUIRE
12 INCOME LIFE INSURANCE :	12 ROCCO E. COZZA, ESQUIRE
13 COMPANY, :	13 COZZA LAW GROUP PLLC
14 Defendants. :	14 400 Holiday Drive
15 - - - - -x	15 Suite 210
16	16 Pittsburgh, Pennsylvania 1220
17 Deposition of RENÉE MARGARET ZINSKY	17 (412)790-2789
18 Pittsburgh, Pennsylvania	18
19 Friday, January 13, 2023	19
20 9:22 a.m.	20
21	21
22	22
23 Job No.: 476914	23
24 Pages: 1 - 168	24
25 Reported By: Amelia Bowlen, FAPR, RDR, CRR, CRC	25
2	4
1 Deposition of RENÉE MARGARET ZINSKY, held at	1 C O N T E N T S
2 the offices of:	2
3	3 EXAMINATION OF RENÉE MARGARET ZINSKY PAGE
4	4 By Mr. Webb 5
5	5
6 COZZA LAW GROUP PLLC	6 TIME ON THE RECORD: 3 hours 8 minutes
7 400 Holiday Drive	7
8 Suite 210	8 E X H I B I T S
9 Pittsburgh, Pennsylvania 1220	9 (Attached to transcript.)
10 (412)790-2789	10 NUMBER PAGE
11	11 Exhibit 1 Text messages: Russin00139, 44
12	12 00140, 00142, 00143, 00144,
13	13 00145, 00149, 00151, 00152,
14 Pursuant to notice, before Amelia Bowlen,	14 00154, 00156, 00157, 00161,
15 Registered Diplomate Reporter, Certified Realtime	15 00163, 00170, 00172, 00177,
16 Reporter, and Notary Public in and for the	16 00178, 00189
17 Commonwealth of Pennsylvania.	17 Exhibit 2 Messages, Russin00102 - 00103 58
18	18 Exhibit 3 Video 115
19	19 Exhibit 4 Russin00012 - 00013 129
20	20 Exhibit 5 Zinsky000001 132
21	21 Exhibit 6 Video, Russin00052 135
22	22 Exhibit 7 Video, Russin00048
23	23 Exhibit 8 Video, Russin00051 140
24	24 Exhibit 9 Video, Russin00055 143
25	25

Transcript of Reneé Margaret Zinsky  
January 13, 2023

29 (113 to 116)

<p style="text-align: right;">113</p> <p>1 say you don't know.</p> <p>2 <b>A No, I don't know. I don't know.</b></p> <p>3 Q Did you have lunch?</p> <p>4 <b>A Yeah, probably, yeah.</b></p> <p>5 Q Do you know what you had for lunch?</p> <p>6 <b>A Probably either Taco Bell or Jersey Mike's</b></p> <p>7 <b>or Jimmy John's. You know, those are the local</b></p> <p>8 <b>places we always ordered from.</b></p> <p>9 Q Did you report this incident to the</p> <p>10 police?</p> <p>11 <b>A No, like I wanted to -- I wanted to keep</b></p> <p>12 <b>my job.</b></p> <p>13 Q Did you treat at the hospital for this</p> <p>14 incident?</p> <p>15 <b>A On the -- like two days after, I think, a</b></p> <p>16 <b>day or two after, I went to the hospital, yes,</b></p> <p>17 <b>because I still was not feeling okay.</b></p> <p>18 Q Did they run tests?</p> <p>19 <b>A I believe so.</b></p> <p>20 MS. WILLIAMSON: If you know. If you don't</p> <p>21 know, that's fine.</p> <p>22 <b>A I don't know for sure.</b></p> <p>23 Q Which hospital was it?</p> <p>24 <b>A UPMC Passavant.</b></p> <p>25 Q Was there a tox report done, toxicology</p>	<p style="text-align: right;">115</p> <p>1 <b>A Okay.</b></p> <p>2 Q I'm just going to pull it up.</p> <p>3 MR. WEBB: These were videos that I think</p> <p>4 you provided us during initial disclosures, Amy,</p> <p>5 just for your knowledge.</p> <p>6 (Zinsky Deposition Exhibit 3 was marked</p> <p>7 for identification and is attached to the</p> <p>8 transcript.)</p> <p>9 Q Is this from the date of that incident,</p> <p>10 this video? I don't think there's any sound with</p> <p>11 this, but I'll turn it up anyway.</p> <p>12 (Video playing.)</p> <p>13 <b>A Maybe, maybe.</b></p> <p>14 Q Do you know who took that video?</p> <p>15 <b>A It might have been one of my friends,</b></p> <p>16 <b>Matt, slash colleague.</b></p> <p>17 Q Who is Matt?</p> <p>18 <b>A Matt Mamros, he was another colleague of</b></p> <p>19 <b>mine.</b></p> <p>20 Q How do you spell the last name?</p> <p>21 <b>A M-a-m-r-o-s.</b></p> <p>22 Q Okay. Why would he have taken you to the</p> <p>23 hospital?</p> <p>24 <b>A Because I think we were riding out</b></p> <p>25 <b>together to go to appointments, and I told him I</b></p>
<p style="text-align: right;">114</p> <p>1 report?</p> <p>2 <b>A I don't know.</b></p> <p>3 MR. WEBB: I assume that would be in the</p> <p>4 UPMC records once we're able to get them.</p> <p>5 MS. WILLIAMSON: I mean, I don't -- yeah.</p> <p>6 MR. WEBB: I still don't have those</p> <p>7 authorizations, by the way.</p> <p>8 MS. WILLIAMSON: I was actually going to do</p> <p>9 them here, but we'll get them to you either -- the</p> <p>10 signed verification and authorizations.</p> <p>11 MR. WEBB: I can print and you can sign them</p> <p>12 if that works.</p> <p>13 THE WITNESS: That's fine.</p> <p>14 MS. WILLIAMSON: We can do them here. It</p> <p>15 doesn't matter, but I haven't seen them, to answer</p> <p>16 your question.</p> <p>17 BY MR. WEBB:</p> <p>18 Q To your knowledge, what were you diagnosed</p> <p>19 with?</p> <p>20 <b>A I wasn't really -- I don't even think -- I</b></p> <p>21 <b>don't know if I was diagnosed with anything. They</b></p> <p>22 <b>gave me fluids, and I don't know.</b></p> <p>23 Q I'm going to show you a video. I just</p> <p>24 want you to tell me whether this is from that</p> <p>25 hospital visit.</p>	<p style="text-align: right;">116</p> <p>1 <b>didn't feel good so we -- like I still wasn't</b></p> <p>2 <b>feeling good and I was not okay, and he said,</b></p> <p>3 <b>let's go to the hospital. So he came with me</b></p> <p>4 <b>because he was already in my car.</b></p> <p>5 Q Did anyone tell you that Mike administered</p> <p>6 GHB to you in March 2020?</p> <p>7 <b>A No.</b></p> <p>8 MR. COZZA: And this hospital visit was two</p> <p>9 days after the incident you're claiming, correct?</p> <p>10 THE WITNESS: A day or two. I don't know</p> <p>11 for sure. It was within a day or two.</p> <p>12 MR. WEBB: I just want to see if I have any</p> <p>13 more related to the car rides and then we can take</p> <p>14 like a 15-minute break, Amy, if that's okay with</p> <p>15 you.</p> <p>16 MS. WILLIAMSON: I'm sorry. I thought you</p> <p>17 were asking her, yeah.</p> <p>18 MR. WEBB: Okay.</p> <p>19 MS. WILLIAMSON: Whatever you want to do,</p> <p>20 Reneé. I mean, unless if it's easier for you to</p> <p>21 keep going, then we can keep going.</p> <p>22 MR. WEBB: I kind of just need a quick break</p> <p>23 to just go and get refreshed, if that's okay. We'll</p> <p>24 be quick.</p> <p>25 MR. COZZA: I believe in your Complaint you</p>

# EXHIBIT "D"



# **EXHIBIT “E”**



**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

RENEE ZINSKY,  
Plaintiff,  
v.

Civil Action No. 2:22-cv-247-MJH

Judge Horan

MICHAEL RUSSIN, et al.,

Defendant.

JURY TRIAL DEMANDED

**AFFIDAVIT OF MATTHEW MAMROS**

I, Matthew Mamros, hereby state the following:

1. I am a former insurance agent for American Income Life Insurance Company and Arias Agencies.
2. I worked with Plaintiff, Renee Zinsky, and Defendant, Michael Russin.
3. I have firsthand knowledge of facts relevant to this matter.
4. On or about March 8, 2023, Defendant Russin threatened me via Instagram messenger stating as follows:

*Are you prepared for violence?*

...

*All this time you spend at 2am sending emails – do you ever think of the safety of your children?*

...

*Oh no wait this isn't the old hag*

...

*This is the young liar*

I declare under penalty of perjury that the following is true and correct.

Date: 05/02/2023

*Matthew Mamros*

Matthew Mamros

**VIRGINIA ACKNOWLEDGMENT**

State of Virginia )

County of Roanoke )On 05/02/2023 before me, Alexander Luis Marin,  
*Date Notary Name*personally appeared Matthew Mamros  
*Name(s) of Signer(s)*☐ personally known to me -- OR --☐ proved to me on the basis of the oath of \_\_\_\_\_ -- OR --  
*Name of Credible Witness*☒ proved to me on the basis of satisfactory evidence: Driver License  
*Type of ID Presented*

to be the individual(s) whose name(s) is (are) subscribed to the within instrument, and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies) and by proper authority, and that by his/her/their signature(s) on the instrument, the individual(s), or the person(s) or entity upon behalf of which the individual(s) acted, executed the instrument for the purposes and consideration therein stated.

WITNESS my hand and official seal.

Notary Public Signature: Alexander Luis MarinNotary Commission Number: 7871785Notary Commission Expires: 08/31/2024*Notarized online using audio-video communication***DESCRIPTION OF ATTACHED DOCUMENT**Title or Type of Document: AFFIDAVIT OF MATTHEW MAMROSDocument Date: 05/02/2023 Number of Pages (w/ certificate): 2

Signer(s) Other Than Named Above: \_\_\_\_\_

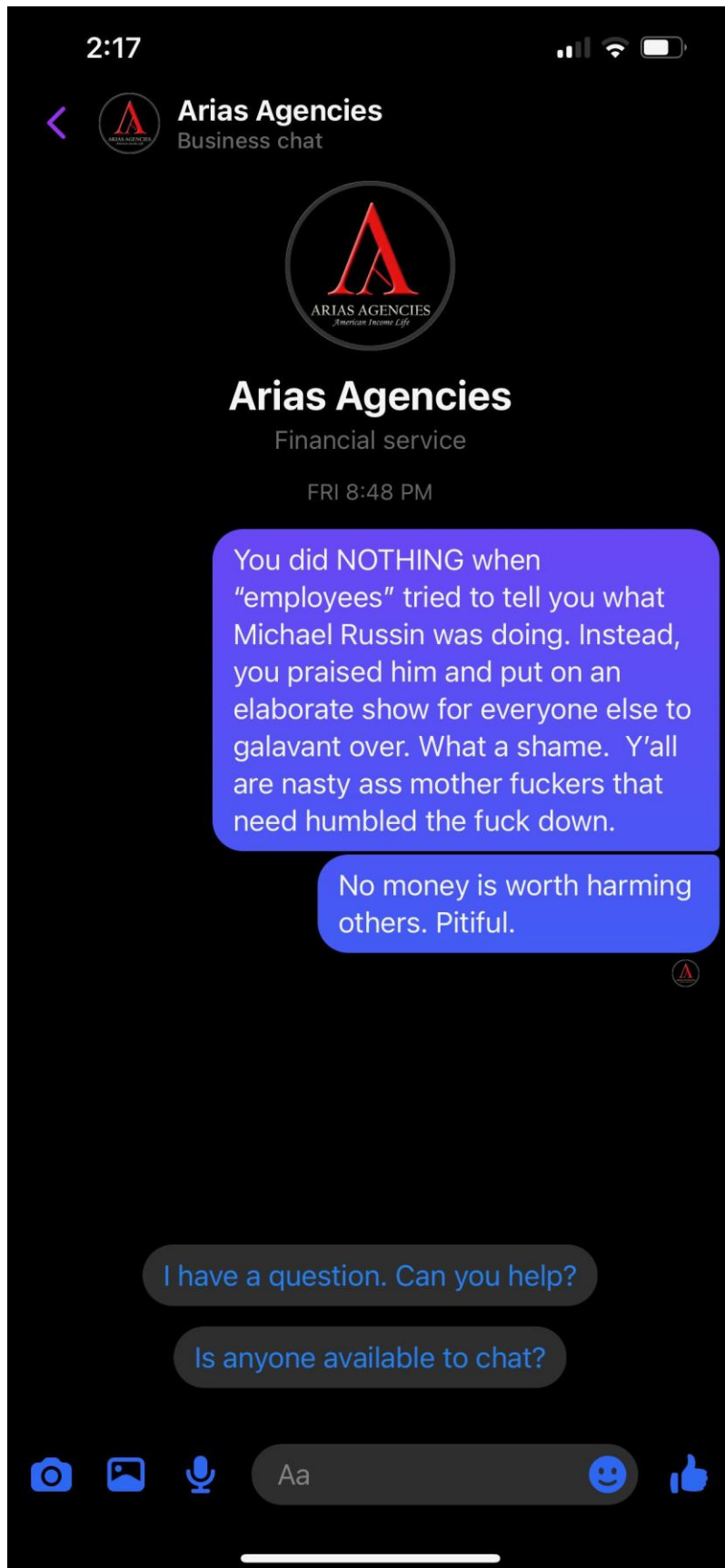
**Capacity(ies) Claimed by Signer(s)**Signer's Name: Matthew Mamros☐ Corporate Officer Title: \_\_\_\_\_☐ Partner – ☐ Limited ☐ General☒ Individual ☐ Attorney in Fact☐ Trustee ☐ Guardian of Conservator☐ Other: \_\_\_\_\_Signer Is Representing: \_\_\_\_\_  
Matthew Mamros**Capacity(ies) Claimed by Signer(s)**

Signer's Name: \_\_\_\_\_

☐ Corporate Officer Title: \_\_\_\_\_☐ Partner – ☐ Limited ☐ General☐ Individual ☐ Attorney in Fact☐ Trustee ☐ Guardian of Conservator☐ Other: \_\_\_\_\_

Signer Is Representing: \_\_\_\_\_

# EXHIBIT “F”



# EXHIBIT "G"

Text Message  
Today 6:34 PM

Hey! Is this Emily? :)

Hiiiiii yes, who's this??

Awe! You seem so nice for someone talking shit on social media about someone's kids! Can't wait to meet you!

You were offering your address up or something do you mind if we have that?

Lmao wtf 😂

Do you mind if we have your address so someone can hypothetically pay your  
and your balding boyfriend a visit?

get lost 🤞 it's a Sunday, I don't do drama, weirdo

Sorry \*

I'm engaged lmao

Pay your FAT A\$\$

# EXHIBIT "H"

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

RENEE ZINSKY,  
Plaintiff,  
v.

Civil Action No. 2:22-cv-247-MJH

Judge Horan

MICHAEL RUSSIN, et al.,  
  
Defendant.

JURY TRIAL DEMANDED

**AFFIDAVIT OF EMILY GARRETT**

I, Emily Garrett, hereby state the following:

1. I was employed by American Income Life Insurance Company (“AIL”) in the capacity of a sales agent from August 2018 to August 2019, approximately.
2. In my capacity as an AIL sales agent, I worked for Russin Financial and Arias Agencies.
3. In that capacity, I reported up to Michael Russin and Simon Arias.
4. Soon after I signed my agent contract and began working for AIL, I discovered that AIL controlled all aspects of my work including but not limited to my schedule, hours, and manner in which I performed my work as a sales agent on behalf of AIL.
5. In my capacity as a sales agent for AIL, I worked in a highly toxic, misogynistic, and often violent working environment as an AIL sales agent.
6. For example, I quickly discovered that there were zero females in management or leadership positions at AIL, Arias Agencies, and/or Russin Financial.
7. For example, I witnessed unwelcomed sexual comments and unwelcomed sexual contact from AIL’s male leaders such as Michael Russin toward subordinate female agents on a frequent basis.
8. On multiple occasions, Michael Russin sent me sexual, lewd, and offensive messages while working in his capacity as my supervisor and a leader on behalf of American Income Life Insurance Company, Arias Agencies, and Russin Financial.



9. Michael Russin would typically refer to females as “sluts”, “whores”, and “bitches”.

10. AIL’s top leaders such as Simon Arias knowingly maintained a toxic workplace by rewarding and encouraging male leaders such as Michael Russin in light of their openly offensive conduct such as sexual harassment, sexual assault, and fraud.

11. Male leaders such as Simon Arias and Michael Russin threatened subordinate agents against retaining legal counsel and/or otherwise attempting to speak up and/or report their misconduct.

12. On or about May 2023, I spoke up publicly about the toxic work environment that I experienced while working for AIL, Arias Agencies, and Russin Financial.

13. Approximately one week later, I received violent threats which I believe were sent, caused, or otherwise directed by Michael Russin.

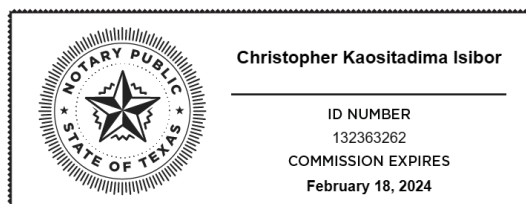
I declare under penalty of perjury that the following is true and correct.

Date: 6/1/2023

  
Emily Garrett

State of Texas, Williamson County

Signed on 06/01/2023 by Emily Elizabeth Garrett





Notary Public, State of Texas

# EXHIBIT "I"



AMY N. WILLIAMSON  
ATTORNEY AT LAW

June 11, 2023

Benjamin D. Webb, Esq.  
Cozza Law Group PLLC  
4000 Holiday Drive, Suite 210  
Pittsburgh, PA 15220  
bwebb@cozzalaw.com

SENT VIA EMAIL

Re: *Zinsky v. Russin et al.*  
No. 2:22-cv-547  
Plaintiff's Fourth Supplemental Discovery Responses

Dear Mr. Webb,

Please allow this correspondence to supplement Plaintiff's discovery responses in the above referenced matter.

**Plaintiff's Fourth Supplemental Answer to Defendant Russin's Interrogatory No. 2:**

In addition to the witnesses previously identified in Plaintiff's Initial Disclosures and discovery responses, Plaintiff identifies the following 51 witness who have knowledge of facts relevant to Plaintiff's claims pending against Defendant Russin. (The witnesses with an \* indicates that they are clients of Williamson Law LLC.) More specifically, the additional witnesses are as follows:

- |                         |                      |
|-------------------------|----------------------|
| 1. Kailey Andrasko*     | 27. Michael Manna    |
| 2. Ky Andrew            | 28. Sophia Menelle * |
| 3. Erin Antoncic*       | 29. Brooke Miller    |
| 4. Jeanine Barlettano*  | 30. Genna Miller     |
| 5. Michael Barlettano*  | 31. Jordan Miller*   |
| 6. Dominic Bertini      | 32. Jocelyn Morose*  |
| 7. Janeen Bonnay*       | 33. Ashley Morton*   |
| 8. Tiffany Brianna      | 34. Ted Mrkonja      |
| 9. Sarah Bunting*       | 35. Jean Novak       |
| 10. Anna Carley         | 36. Ryan Ohm         |
| 11. Bernadette Casciato | 37. Ryleigh Palmer*  |
| 12. Joseph Crivelli     | 38. Ryan Parrish     |
| 13. Christa Davis*      | 39. Peter Reichert   |
| 14. Scott Dehning*      | 40. Calene Rogers*   |
| 15. Tristan Dlabik      | 41. Alyssa Sadler    |
| 16. Matt Ficarra*       | 42. Ashley Seddon    |
| 17. Emily Garrett*      | 43. Suna Shaw        |

- |                         |                          |
|-------------------------|--------------------------|
| 18. Lee Ann Heffley*    | 44. Linette Silverthorne |
| 19. Chatiqua Hemingway* | 45. David Strassburger   |
| 20. Brittany Ketner     | 46. Katie Thompson       |
| 21. Michelle Kruse      | 47. Laura Toney          |
| 22. Gabrielle Kolar*    | 48. Tyler Turner         |
| 23. Erica Laughlin      | 49. Alyssa Weston        |
| 24. Corey Lemos*        | 50. Susan Antilla        |
| 25. Tyler Lindquist*    | 51. Emily Cook*          |
| 26. Morgan Luptak       |                          |

### **Plaintiff's Fourth Supplemental Response to Defendant Russin's Request For Production No. 2:**

Plaintiff produces 23 additional video recordings via Google Drive relevant to Plaintiff's claims against Defendant Russin. The link to access those files is as follows:

[https://drive.google.com/drive/folders/1Zq2MQZxXU3OtBcmsBQwWegL5VUITOZA1?usp=drive\\_link](https://drive.google.com/drive/folders/1Zq2MQZxXU3OtBcmsBQwWegL5VUITOZA1?usp=drive_link)

Specifically, those 23 video recordings are identified as follows:

- |                                     |   |
|-------------------------------------|---|
| 1. 64k Per Week                     | 13. Dlabik Culture Chant                    |
| 2. AIL Cancun 2023                  | 14. Dlabik Dissect Your Personal Life       |
| 3. Arias Boxing Gloves              | 16. Dlabik It Will Cost You Everything      |
| 4. Jackson 74k Month                | 17. Dlabik There's No Reason                |
| 5. Arias Not a Job a Lifestyle      | 18. Dr. Parrish                             |
| 6. Arias The Edge                   | 19. Globe Life Legacy Award 2022            |
| 7. Arias Workout                    | 20. Jackson Dlabik Celebration              |
| 8. Cornhole Agency Meeting          | 21. Job Description                         |
| 9. Dlabik Be a Lion                 | 22. Nemaicolin Arias Executive Counsel 2022 |
| 10. Dlabik Be a Patriarch           | 23. You Not a Man?                          |
| 11. Dlabik Blue Collar              |   |
| 12. Dlabik Bribing College Dropouts |   |
| 13. Dlabik Cause I Failed           |   |

In addition, Plaintiff identifies all Absideon Achievement podcast episodes and other social media content as published by Defendant Russin to date and ongoing, as well as 11 additional video recordings and documents located at the below referenced website links:

1. Business Insider, *Inside The Tawdry, Drug-fueled, Violent World of America's Top Life Insurance Salesman*, February 24, 2023  
<https://www.insider.com/globe-life-insurance-lawsuit-american-income-arias-agency-toxic-workplace-2023-1>
2. Business Insider, *Globe Life Fallout After Allegations of Sexual Assault*, March 10, 2023  
<https://www.insider.com/globe-life-fallout-after-allegations-of-sexual-assault-arias-agency-2023-3>
3. Businesswire, *Investigation Alert: Scott + Scott Attorneys at Law LLP Investigates Globe Life Inc.'s Directors and Officers for Breach of Fiduciary Duties – GL*, February 23, 2023  
<https://www.businesswire.com/news/home/20230227005945/en/INVESTIGATION-ALERT-ScottScott-Attorneys-at-Law-LLP-Investigates-Globe-Life-Inc.%E2%80%99s-Directors-and-Officers-for-Breach-of-Fiduciary-Duties-%E2%80%93-GL>
4. Carey & Associates, P.C., *The Worst Sexual Harassment Case Ever!*, March 10, 2023  
<https://capclaw.com/the-worst-sexual-harassment-story-ever/>

5. Globe News Wire, *GL Alert: Johnson Fistel is Investigating Potential Claims on Behalf of Globe Life Inc.*, March 2, 2023  
<https://www.globenewswire.com/news-release/2023/03/02/2619654/0/en/GL-Alert-Johnson-Fistel-is-Investigating-Potential-Claims-on-Behalf-of-Globe-Life-Inc.html>
6. Insurance Newsnet, *Author: Financial Services Often “A Barbaric Culture” That Worships Money*, March 3, 2023  
<https://insurancenewsnet.com/innarticle/author-financial-services-often-a-barbaric-culture-that-worships-money>
7. OpenPR, *Investigation Announced for Investors in Shares of Globe Life Inc. (NYSE: GL)*, March 7, 2023  
<https://www.openpr.com/news/2963434/investigation-announced-for-investors-in-shares-of-globe-life#:~:text=An%20investigation%20was%20announced%20over%20potential%20securities%20laws,mail%40shareholdersfoundation.com%20or%20call%20%2B1%20%28858%29%20779%20-%201554.>
8. Stanford Law School, *Lawsuit Against American Income Life Alleges Sex Abuse, Hard Drugs, Fraud at Top Agency*, February 28, 2023  
<https://law.stanford.edu/press/lawsuit-against-american-income-life-alleges-sex-abuse-hard-drugs-fraud-at-top-agency/>
9. WPXI, *Federal Lawsuit Filed Against Wexford Life Insurance Company*, June 1, 2023  
<https://www.wpxi.com/news/local/federal-lawsuit-filed-against-wexford-life-insurance-company/E7VLBV53LZF67FWJ6D2BLK5IQ4/#:~:text=Channel%2011%20also%20reached%20out%20to%20its%20parent,aware%20of%20any%20criminal%20investigations%20against%20the%20company>
10. WTAE, *Lawsuit Alleges Fraud, Sexual Abuse and Illicit Drugs at Wexford Insurance Agency*  
<https://www.wtae.com/article/arias-agencies-wexford-insurance-allegations-drugs-sexual-abuse/43980886>
11. Yahoo News, *Federal Lawsuit Alleging Sexual Assault, Drug Use Filed Against Wexford Life Insurance Company*, June 1, 2023  
<https://news.yahoo.com/federal-lawsuit-filed-against-wexford-213419791.html>

Finally, please see additional documents labelled as [ZINSKY001793 - ZINSKY002237] produced at the Google Drive link noted above. Please let me know if you have any issues accessing same.

Sincerely,

/s/Amy N. Williamson, Esq.

# EXHIBIT "J"



+1 (814) 208-9636 >

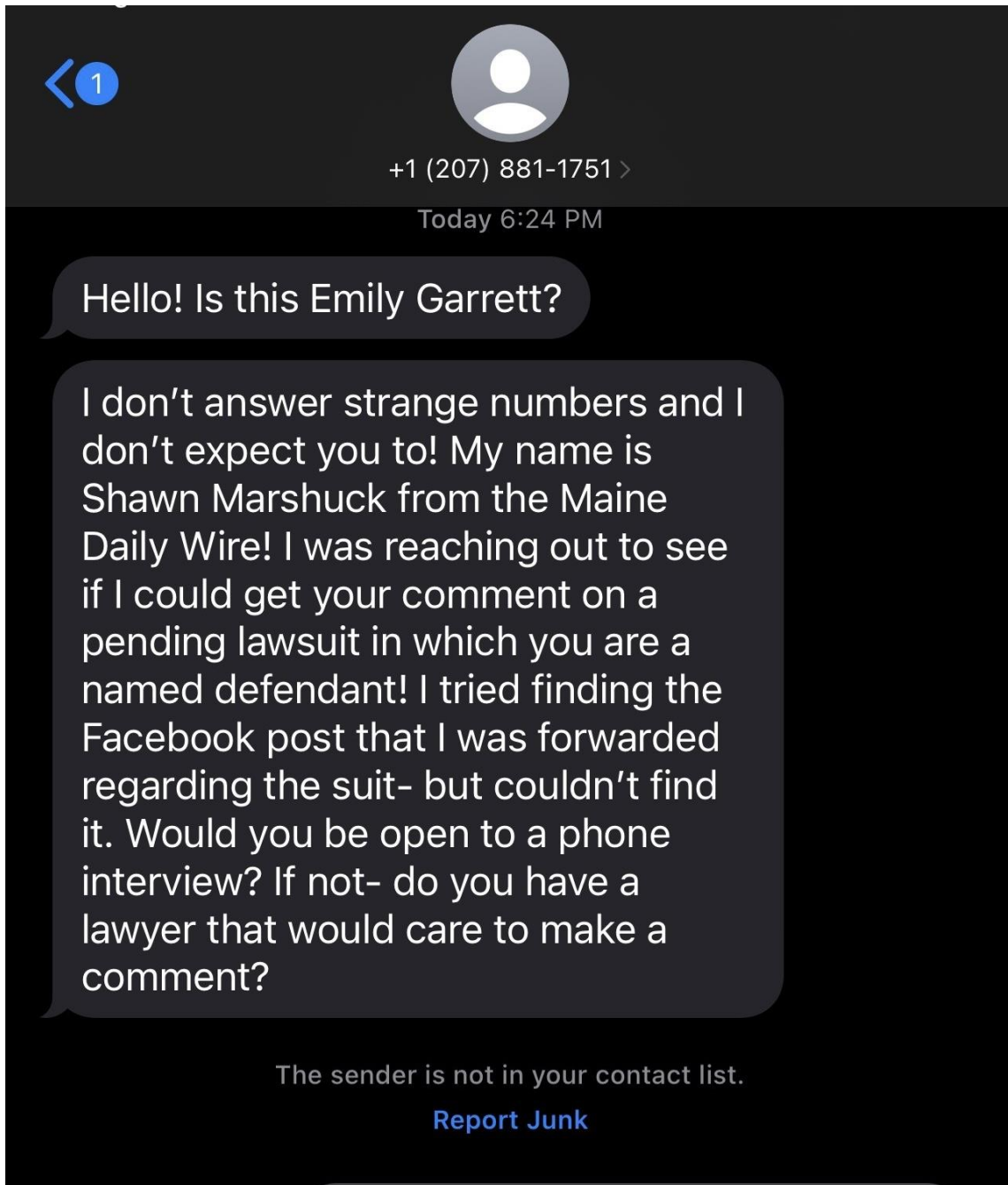
Hey Em! You don't know me but I know one of your family members really well that's all I can say.

I work at a district court and if I were you I'd get a lawyer immediately. There is a big lawsuit coming down with your name and a few others on it. You're going to get a litigation hold which means you need to preserve everything. It looks like it's for a couple million dollars and defamation I didn't catch the name of the person filing it I just saw your name in passing.

I'd get a lawyer asap or maybe you already know this and this was a waste.

# EXHIBIT "K"





# EXHIBIT "L"

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

RENEE ZINSKY,  
Plaintiff,  
v.

Civil Action No. 2:22-cv-247-MJH

Judge Horan

MICHAEL RUSSIN, et al.,  
  
Defendant.

JURY TRIAL DEMANDED

**AFFIDAVIT OF CHATIQUA HEMINGWAY**

I, Chatiqua Hemingway, hereby state the following:

1. I am a professional female boxer.
2. I live and work in the Pittsburgh, Pennsylvania area.
3. Between 2020 and March 2023, I was a member of the Board of Directors for a charity known as Steel City Impact (“SCI”).
4. Between August 2020 and March 2023, I worked for Simon Arias (“Arias”) as a personal trainer.
5. In my capacity as a board member for SCI and trainer for Arias, I worked closely with Arias in Arias Agencies and American Income Life Insurance Company (“AIL”) office located in Wexford, Pennsylvania (“Wexford Office”).
6. Between August 2020 and March 2023, I was in the Wexford Office multiple times per week.
7. Between August 2020 and March 2023, I also spent a lot of time with Arias outside of the office.
8. Between August 2020 and March 2023, I had a close personal and professional relational relationship with Simon Arias.
9. From August 2020 to March 2023, I developed relationships with Arias’ co-workers, Arias’ friends, and Arias’ family members.
10. I witnessed Arias and other male leaders such as Michael Russin (“Russin”) on behalf of AIL in countless work meetings, calls and other events both at the Wexford Office and at other work-related events.
11. I have firsthand knowledge of a misogynistic, sexist, and toxic workplace culture at AIL and Arias Agencies which was driven by the AIL male leaders such as Arias and Russin.

12. For example, AIL leaders such as Arias and Russin often made demeaning, sexist, perverted, offensive, and often angry comments to and about females both in the AIL workplace and otherwise.
13. For example, Arias would refuse to hire or promote females for reasons such “they talk too much” or “ask too many questions”.
14. The toxic workplace culture at Arias Agencies was also driven by Arias’ focus on grooming and recruiting minors on behalf of AIL, Arias Agencies, and SCI.
15. Arias would often lie, mislead, and manipulate minors to his personal and professional benefit.
16. Arias asked me to help him recruit minors. Specifically, Arias said he was looking for “cute young girls”, “good looking popular girls”, and asked me where he could find the “cutest young black girls in Pittsburgh.”
17. I have firsthand knowledge of Arias engaging in inappropriate sexual conversations and conduct with minors as young as 12 and 13 years old.
18. I voiced my concerns about Arias’ inappropriate conduct with minors to other SCI Board members and refused to help Arias recruit minors on behalf of SCI.
19. When Arias learned that I voiced concerns about his inappropriate conduct, Arias offered me \$10,000.00 to step down from the SCI Board of Directors, which I refused.
20. After I refused Arias’ bribe, Arias retaliated against me by removing me from the SCI Board of Directors.
21. After I refused Arias’ bribe, Arias retained legal counsel (Strassburger, McKenna, Gutnik & Gefsky) in an attempt to intimidate, threaten and silence me from speaking the truth.
22. I have firsthand knowledge of AIL’s male leaders, including but not limited to Arias and Russin, engaging in intimidation tactics, threats, and violence in their capacity as AIL representatives.
23. I have firsthand knowledge of AIL’s male leaders, including but not limited to, Arias and Russin taking steroids and other illegal drugs in the office and/or at AIL work related events.

I declare under penalty of perjury that the following is true and correct.

Date: 05/17/2023

Chatiqua Hemmingway  
Chatiqua Hemmingway

